

EXHIBIT D

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION**

DV INJURY LAW, PLLC;
and HAH, LLP,
Plaintiffs,

Case No. 5:24-cv-12772-JEL-APP
Hon. Judith E. Levy

vs.

**TORT PRIVATE
INVESTIGATIONS, LLC;**
**DAVID BAUMAN; SARAH
HALE BAUMAN;**
and **BENTLEY CONSULTING,
LLC,**
Defendants.

AFFIDAVIT OF VENAR AYAR

STATE OF MICHIGAN)
)ss
COUNTY OF OAKLAND)

I, Venar Ayar, being first duly sworn, depose and state as follows:

1. I have personal knowledge of the facts contained in this Affidavit. I am competent and of legal age to testify as to the facts contained in this Affidavit under oath in a Court of competent jurisdiction.
2. I am a Member of DV Injury Law PLLC (“DV”).
3. At all times during my affiliation with Plaintiffs I have lived and worked in Michigan.

4. Part of the work performed by DV involves litigating complex “mass tort” cases in many jurisdictions, including the state of Michigan. This requires the firm to onboard, contact, service, and otherwise manage numerous claimants related to mass-tort cases.

5. During my period of affiliation DV has required assistance managing and servicing claimants for mass tort litigation, including claimants located and residing in Michigan.

6. In 2022 DV entered into a contractual agreement with Bentley Consulting, LLC (“Bentley”), which is owned and operated by David Bauman (“Mr. Bauman”) and Sarah Hale Bauman (“Ms. Bauman”). I signed this contract in Michigan. They knew and voluntarily entered into doing business with a Michigan company and working with our employees and clients here in Michigan.

7. In 2022 DV also entered into a contractual agreement with Tort Private Investigations, LLC (“TPI”), also known as Tort Concierge Integrated (TCI). I signed this contract in Michigan. TPI also knew and voluntarily entered into business with a Michigan company and working with our employees and clients here in Michigan.

8. Bentley was to supervise TPI. TPI was to provide case management litigation support to DV.

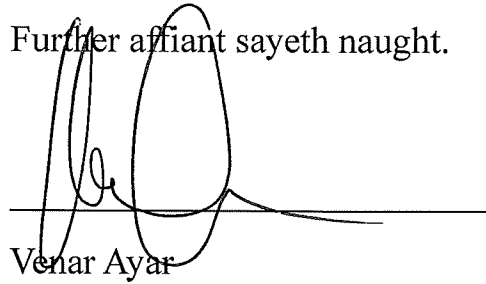
9. I personally had contact with the Defendants from my work in Michigan. I communicated with both Daved Bauman and Sarah Hale Bauman of Bentley relative to Bentley and TPI. I also had direct communications with Eileen Lee, COO of TPI, while I was in Michigan.

10. From the beginning of the TPI contract DV Michigan employees worked with TPI employees.

11. As time passed DV Michigan employees worked more with TPI employees.

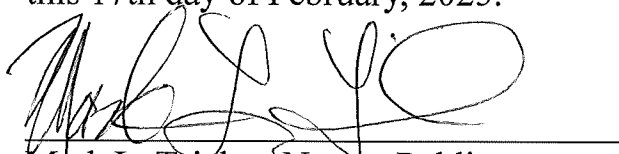
12. Eventually, DV Michigan employees took over all case management duties in place of all Defendants.

Further affiant sayeth naught.



Venar Ayar

Subscribed and sworn to before me in
Oakland County, Michigan on
this 17th day of February, 2025.



Mark L. Teicher, Notary Public
State of Michigan, County of Oakland
My Commission Expires: 08/14/2025
Acting in Oakland County, Michigan